

Presentment Date and Time: December 26, 2019 at 12:00 noon (EST)
Objection Deadline: December 26, 2019 at 11:30 a.m. (EST)

CHAPMAN AND CUTLER LLP
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-and-

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Counsel for the Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re : Chapter 11
:
Retrieval-Masters Creditors Bureau, Inc.,¹ : Case No. 19-23185 (RDD)
:
Debtor. :
-----X

**NOTICE OF PRESENTMENT OF STIPULATION AND
ORDER RESOLVING ADMINISTRATIVE EXPENSE CLAIM OF
EXPERTSOURCE GLOBAL SERVICES PVT. LTD. AND
AUTHORIZING REJECTION OF RELATED AGREEMENT**

¹ The last four digits of the Debtor's taxpayer identification number is 9495. As of November 1, 2019, the Debtor's service address for purposes of this chapter 11 case is 200 Pemberwick Road, Greenwich, CT 06831. The Debtor also does business as American Medical Collection Agency.

PLEASE TAKE NOTICE that the undersigned will present the annexed *Stipulation and Order Resolving Administrative Expense of ExpertSource Global Services PVT. Ltd. and Authorizing Rejection of Related Agreement* (the “**Stipulation**”), to the Honorable Robert D. Drain, United States Bankruptcy Judge for signature on December 26, 2019 at 12:00 noon (EST).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Stipulation must: (i) be made in writing; (ii) state with particularity the grounds therefore; (iii) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”); (iv) be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov, the official website of the Bankruptcy Court), by registered users of the Bankruptcy Court’s case filing system and, by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF), (with hard copy delivered directly to Chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, 300 Quarropas Street, White Plains, New York 10601-4140); and be served in accordance with *Order Granting Debtor’s Motion For Order Authorizing the Establishment of Certain Notice, Case Management, and Administrative Procedures*, entered on June 24, 2019 (ECF No. 31).

PLEASE TAKE FURTHER NOTICE that unless an objection is served and filed so as to be received by **December 26, 2019 at 11:30 a.m. (EST)**, the Stipulation may be signed and entered by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed and served, a hearing will be held to consider such objection before the Honorable Robert D. Drain, United States Bankruptcy Judge at a date and time to be announced.

Dated: December 16, 2019
New York, New York

CHAPMAN AND CUTLER LLP
Counsel for the Debtor and Debtor in Possession

By: /s/Steven Wilamowsky
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In re : Chapter 11
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Retrieval-Masters Creditors Bureau, Inc.,¹ : Case No. 19-23185 (RDD)
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**STIPULATION AND ORDER RESOLVING
ADMINISTRATIVE EXPENSE CLAIM OF
EXPERTSOURCE GLOBAL SERVICES PVT. LTD. AND
AUTHORIZING REJECTION OF RELATED AGREEMENT**

This *Stipulation and Order Resolving Administrative Expense Claim of ExpertSource Global Services Pvt. Ltd. And Authorizing Rejection of Related Agreement* (this “Stipulation”) is entered into by and between Retrieval-Masters Creditors Bureau, Inc. (the “Debtor”) and ExpertSource Global Services Pvt. Ltd. (“ExpertSource” and, together with the Debtor, the “Parties”), by their undersigned counsel, with reference to the following facts:

RECITALS

- A. The Debtor filed its chapter 11 case on June 17, 2019 (the “Petition Date”).
- B. Prior to the Petition Date, and for some period thereafter, ExpertSource provided offshore call center services to the Debtor pursuant to a series of formal and informal agreements between the Parties, beginning with a certain Master Services Agreement, dated November 11, 2014 (as may have been amended, supplemented, or superseded, the “Agreement”).
- C. ExpertSource has filed two proofs of claim in the Debtor’s case, asserting prepetition, unsecured claims [Claim Nos. 19 and 33] (the “Prepetition Claims”).

¹ The last four digits of the Debtor’s taxpayer identification number is 9495. As of November 1, 2019, the Debtor’s service address for purposes of this chapter 11 case is 200 Pemberwick Road, Greenwich, CT 06831. The Debtor also has done business as American Medical Collection Agency.

D. In addition, on November 25, 2019, ExpertSource filed what it designated a *Notice of Hearing on Motion for Administrative Claim 11 U.S.C § 503* [Doc. No. 208] with an attached “Application for Administrative Claim” (collectively, the “Motion”), which seeks immediate payment of \$11,250 on account of services performed subsequent to the Petition Date (the “Administrative Claim”).

E. The Debtor contests the amount of the Administrative Claim. In addition, the Debtor believes that the Motion is procedurally improper.

F. The Parties have agreed to resolve the Administrative Claim, the Motion, and to confirm the rejection of the Agreement, pursuant to this Stipulation.

AGREEMENT

NOW, THEREFORE, in consideration of the foregoing, the Parties hereby stipulate and agree as follows:

1. Upon approval of this Stipulation, the Agreement shall be deemed rejected by the Debtor as of the Petition Date.

2. Within one week after the Stipulation is “so ordered” by the Court and entered on the docket, the Debtor shall pay to ExpertSource eight thousand dollars (US \$8,000.00) in full and final satisfaction of the Administrative Claim, and of any and all claims against or related to the Debtor arising on or after the Petition Date.

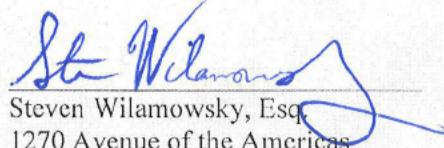
3. The Administrative Claim shall be expunged from the claims register maintained in the Debtor’s case. For the avoidance of doubt, this Stipulation shall not affect the rights of ExpertSource or any person with respect to the Prepetition Claims.

4. This Stipulation shall not be binding upon either of the Parties unless and until it is “so ordered” by the Court.

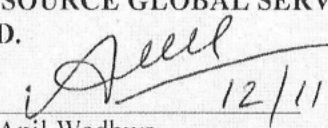
5. The Court shall retain jurisdiction with respect to the interpretation,
implementation, and enforcement of this Stipulation.

Dated: December 11, 2019

CHAPMAN AND CUTLER LLP


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EXPERTSOURCE GLOBAL SERVICES
PVT. LTD.


By: Mr. Anil Wadhwa
As: Chief Executive Officer

12/11/2019

and

Aaron M. Krieger
111 West Monroe Street
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Telephone: 312.845.3000
Email: akrieger@chapman.com

Attorneys for Debtor and Debtor in Possession

SO ORDERED:

Dated: [____], 2019
White Plains, NY

The Honorable Robert D. Drain
United States Bankruptcy Judge